

A1 Broadbent

1  
volume 1, Pages 1-173

2 UNITED STATES DISTRICT COURT  
3 FOR THE DISTRICT OF NEW HAMPSHIRE  
4  
5

6 \* \* \* \* \* \* \* \* \* \*  
7 SUZANNE GENEREUX, ET AL, \*

8 \*

9 Plaintiffs, \*

10 \*

11 v. \* Case No: 04-CV-12137

12 \* JLT

13 AMERICAN BERYLLIA \* USDC District of

14 CORPORATION, ET ALS, \* Massachusetts

15 \*

16 Defendants. \*

17 \* \* \* \* \* \* \* \* \* \*

18  
19 DEPOSITION OF ALFRED BROADBENT  
20 Deposition taken at the law offices of Getman,  
21 Stacey, Schulthess & Steere, P.A., Three Executive  
22 Park Drive, Bedford, New Hampshire, on Wednesday,  
23 June 7, 2006, 10:00 a.m. to 2:08 p.m.

A1 Broadbent

46

1 I can't see her not being on it.

2 Q. Did anyone ever ask you to tell them who should  
3 be on the beryllium list?

4 A. No. They had already premade it up.

5 Q. In the classes that Mr. Hartford gave on  
6 beryllium oxide, what did he say about the  
7 dangers of working with beryllium oxide?

8 A. The do's and don't's, "don't do this" and "don't  
9 do that" and -- you know.

10 Q. What were the things he said not to do?

11 A. Oh, I can't remember exactly. I know he went  
12 into the beryllium windows and he also went into  
13 the beryllium on metal, like machining it. You  
14 got to keep it cool all the time, fluids running  
15 over, no grinding it, things like that.

16 Q. Did he explain that exposure to beryllium oxide  
17 can cause a lung disease?

18 A. Oh, yeah. I do remember him saying that.

19 Q. Did he hand out any written materials at these  
20 meetings?

21 A. I can't -- I can't remember.

22 Q. Did he show any slides or movies?

23 A. I don't remember any slides or movies.

Al Broadbent

113

1 A. Not to my knowledge.

2 Q. Where was this Spencer Laboratories located?

3 A. Spencer's in Burlington.

4 Q. Roughly what time period were the buildings  
5 renovated?

6 A. Oh, boy. Gee, I'm terrible on time. Gee, I  
7 can't come up with a --

8 Q. I don't want you to guess. You can just say, I  
9 don't know, I don't remember.

10 A. I don't really know the exact time.

11 Q. You -- at some point during your deposition,  
12 you've used the terms beryllium and beryllium  
13 oxide interchangeably and beryllia. Are you  
14 familiar with the difference between solid  
15 beryllium metal and beryllium oxide?

16 A. Yes, I am.

17 Q. Okay. So when you said beryllium --

18 A. Beryllium, in this particular deposition, I'm  
19 talking windows.

20 Q. So which would be beryllium oxide?

21 A. Yes.

22 Q. Okay. Were you familiar with any Raytheon  
23 Waltham facilities for working with beryllium

Al Broadbent

114

1 metals during that time period of '83 to '86?

2 A. There was a small amount. Most of it was  
3 carried out in the machine shop downstairs and  
4 they knew how to handle it, and what they would  
5 do is run coolant and there was machining and  
6 that. They knew how to do it. But we didn't do  
7 it.

8 Q. Okay. So Department 3670 did not work with  
9 beryllium metal?

10 A. No; no, not machining or anything like that.  
11 The only beryllium metal that we had were  
12 beryllium tools because they're nonmagnetic, and  
13 when you're working with big magnets, if you use  
14 a magnetic tool, you go to tighten a nut or  
15 something and the wrench would stick to a  
16 magnet, so the nonmagnetic tools were used  
17 because they're nonmagnetic. But other than  
18 that, that's the only thing we used - beryllium.

19 Q. So just to clarify that, you might have used  
20 some beryllium containing tools in your process,  
21 but you didn't --

22 A. Wrenches.

23 Q. Okay, wrenches.